

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

Salia Issa, )  
Fiston Rukengeza, and )  
Salia Issa and Fiston Rukengeza as )  
next friends of their unborn child, )  
Plaintiffs, )  
v. ) CIVIL ACTION NO: 1:22-cv-1107-LY  
Texas Department of Criminal Justice, )  
Lt. Brandy Hooper, individually, )  
Lt. Desmond Thompson, individually, and )  
Assist. Warden Alonzo Hammond, individually, )  
Defendants. )

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**PLAINTIFFS' MOTION TO FILE A SURREPLY IN RESPONSE TO**  
**DEFENDANTS' REPLIES**

Through counsel, Cronauer Law, LLP, Plaintiffs hereby move to file a surreply in response to Defendants' replies (Doc. #28 and #29). In support thereof, Plaintiffs state as follows.

1. Pursuant to Local Rule CV-7(e), surreplies are prohibited absent leave of Court.
2. Plaintiffs hereby move to file the attached surreply to eliminate confusion as to their theory on Count 1 of the operative complaint (Doc. #18)—a theory which Defendants' replies repeatedly characterize as involving some type of “pivot.”
3. Permitting the surreply (which is two pages) will hopefully prevent the Court from unnecessary work in ruling on the pending motions, as it will clarify an issue that has developed during motion practice.

WHEREFORE, Plaintiffs respectfully request this Court grant the present motion and consider the attached surreply.

Respectfully submitted,

/s/ Ross A. Brennan  
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